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To: <wvogl@samhsa.gov>
Date: 7/11/04 5:24PM
Subject: Revised Mandatory Guidelines FR DOCKET 04-7984

As a person who suffers from shy bladder syndrome (paruresis), I am very concerned that inability to provide a specimen can be treated as a test refusal and thus cause for employment rejection or termination. I have no personal concern, because I am retired. However I have experienced the stress of fluid loading over many hours and still having extreme difficulty in providing a minimal sample. At those times, long ago, a modicum of privacy was provided, otherwise I would have been unable to void, leading to employment rejection.

My present concern is for many people I know who suffer from paruresis and are faced with the possibility of job rejection or termination solely on the basis of inability to urinate in public. The test is intended to detect drug use, and inability to provide a specimen should not be considered tantamount to proof of drug use. Alternatives to urine testing, such as sweat, saliva, blood or hair must be available to the person being tested, as a legal requirement.

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